

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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Date 9-30-05
By [Signature]
Deputy Clerk

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER,
JOHN DOES 1 THROUGH 5,
AND JANE DOES 1 THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

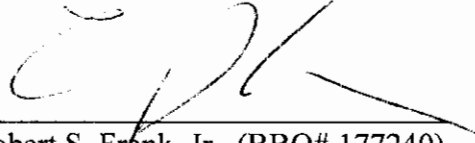
**PLAINTIFF SHAREHOLDER.COM'S MOTION TO IMPOUND
SHAREHOLDER.COM'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of its Motion to Compel Production of Documents, which is being delivered by hand to the Court today. The motion discusses and attaches excerpts of deposition transcripts and documents that have been designated as "Confidential" under the Stipulated Protective Order in this case. See Docket No. 37. Under that Order, Shareholder.com is required to seek impoundment of any documents filed with the Court containing "Confidential" or "Highly Confidential" information. *See id.* at ¶ 14. Shareholder accordingly moves for impoundment.

Respectfully submitted,

DIRECT REPORT CORPORATION
d.b.a. SHAREHOLDER.COM

By its attorneys,

A handwritten signature in black ink, appearing to be "R. Frank, Jr.", written over a horizontal line.

Robert S. Frank, Jr. (BBO# 177240)
Carlos Perez-Albuerne (BBO# 640446)
CHOATE, HALL & STEWART
Two International Place
Boston, MA 02110
(617) 248-5000

Dated: September 30, 2005


CERTIFICATE OF SERVICE

I, Carlos Perez-Albuerne, hereby certify that a true copy of this document was served by hand on this 30th day of September, 2005 upon Defendants, CCBN.com and the Thompson Corporation by delivering a copy of same to:

Anthony S. Fiotto
David M. Moss
Goodwin Procter, LLP
Exchange Place
Boston, MA 02109
617-570-1324
Fax: 617-523-1231

and by hand to Defendant, Robert Adler:

Richard J. McCarthy
Mark B. Dubnoff
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Carlos Perez-Albuerne